

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

VERONICA D. DUGUAY,	)	CIVIL DOCKET NO.
	)	
Plaintiff	)	
	)	
v.	)	
	)	
SWIFT TRANSPORTATION CO.,	)	
INC. and FRANK E. WILSON,	)	
	)	
Defendants	)	

**NOTICE OF REMOVAL**

NOW COMES the Petitioner, Swift Transportation Co., Inc., by and through its attorneys, Richardson, Whitman, Large & Badger, and pursuant to Rule 81(c) of the Federal Rules of Civil Procedure, respectfully shows:

1. On the 12<sup>th</sup> day of February, 2010 an action was commenced against the Petitioner, Swift Transportation Co., Inc., in the Superior Court of the State of Maine in and for the County of Androscoggin, entitled *Veronica D. Duguay v. Frank E. Wilson and Swift Transportation Co., Inc.*, by filing of a Complaint in said Court, a copy of which is attached to this Notice of Removal. Service of process on the Petitioner was made on March 29, 2010, by the undersigned signing an Acceptance of Service on behalf of Swift Transportation Co., Inc. Defendant served an Answer and Interrogatories on April 16, 2010. A copy of the Answer is also attached to this Notice of Removal.

2. The above-described action is one of which this Court has original jurisdiction under the provisions of Title 28, United States Code, Section 1332, and is one which may be removed to this Court by the Petitioner, the Defendant herein, pursuant to

the provisions of Title 28, United States Code, Section 1441, in that it is a civil action wherein the matter in controversy exceeds the sum or value of Seventy-Five Thousand Dollars (\$75,000) exclusive of interest and costs, and is between citizens of different states. The Petitioner was at the time of the commencement of this action and still is a Massachusetts corporation and has its principal place of business in the Phoenix, Arizona; the Plaintiff, Veronica D. Duguay, is a resident of the Town of Livermore Falls, County of Androscoggin and State of Maine.

WHEREFORE, the Petitioner prays that the above action now pending against it in the Superior Court of the State of Maine in and for the County of Androscoggin, be removed therefrom to this court.

DATED at Portland, Maine this 26<sup>th</sup> day of April, 2010.

/s/ Wendell G. Large  
Wendell G. Large (Bar #120)  
Attorney for Defendant  
Swift Transportation Co., Inc.

Richardson, Whitman, Large & Badger  
465 Congress Street  
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(207) 774-7474

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

VERONICA D. DUGUAY,	)	CIVIL DOCKET NO.
	)	
Plaintiff	)	
	)	
v.	)	
	)	CERTIFICATE OF SERVICE
SWIFT TRANSPORTATION CO.,	)	
INC.,	)	
	)	
Defendant	)	

A true copy of Defendant Swift Transportation Co., Inc.'s Notice of Removal was sent by regular U.S. mail on this 26<sup>th</sup> day of April, 2010 to: William D. Robitzek, Esq., Attorney for Plaintiff, Berman & Simmons, 129 Lisbon Street, P. O. Box 961, Lewiston, ME 04243-0961.

/s/ Wendell G. Large  
Wendell G. Large (Bar #120)  
Attorney for Defendant  
Swift Transportation Co., Inc.

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